

EXHIBIT 144

3/4/2025

Richard Kadrey, et al. v. Meta Platforms, Inc. Michael Sinkinson Ph.D.
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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. 3:23-cv-03417-VC
)	
META PLATFORMS, INC.,)	
)	
Defendant.)	

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Video-recorded Deposition of MICHAEL
SINKINSON, PH.D., taken at Cooley LLP,
110 North Wacker Drive, Chicago, Illinois,
before Donna M. Kazaitis, IL-CSR, commencing
at 9:37 a.m. on Tuesday, March 4, 2025.

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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1 A. Just to be clear, I didn't choose just
2 an eight-week window. I chose a one-week, a
3 two-week, a three-week, a four-week. These are
4 all cumulative.

5 Q. But do you go beyond eight weeks?

6 A. Not in this table, no.

7 Q. So why did you choose not to go beyond
8 eight weeks in this table?

9 A. It seems like the point was made.

10 Q. Could you elaborate on that? What do
11 you mean by the point was made?

12 A. Sure. What I'm trying to say there is
13 that the coefficient estimate is stable from five
14 weeks to six weeks to seven weeks to eight weeks.
15 There doesn't seem to be any trend.

16 Q. Do you think that any impact that
17 Llama 3 might have had on book sales would have
18 been fully observable within just those eight
19 weeks?

20 A. It's possible there was an effect
21 later. But, again, per my earlier comments, if
22 anything, this is showing that the books in Books3

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1 slightly improved in rank. So this seemed
2 sufficient.

3 Q. Sufficient how, Professor?

4 A. I felt very convinced from this.

5 Q. From just the eight weeks?

6 A. Again, given the coefficient is
7 stable, yes.

8 Q. What do you mean by "the coefficient
9 was stable"?

10 A. So what we're doing here is starting
11 at a very narrow window after the Llama 3 launch,
12 and we're adding more data in each column and
13 looking for an impact on those books on their
14 sales ranks. As we add another week of data,
15 notice that the point estimate and the confidence
16 intervals are not moving, indicating that the
17 story is not changing as we add more data.

18 Q. And where in this study do I see data
19 about adoption or use of Llama 3?

20 A. I don't have access to that data.

21 Q. Did you ask for access to that data?

22 A. I may have. I don't recall. But I

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1 BY MR. STEIN:

2 Q. Did either of your reports look at the
3 impact of piracy on book sales?

4 MR. MORTON: Object to form.

5 THE WITNESS: No.

6 BY MR. STEIN:

7 Q. Did either of your reports look at the
8 impact of the distribution aspect of torrenting on
9 book sales?

10 MR. MORTON: Object to form.

11 THE WITNESS: No.

12 BY MR. STEIN:

13 Q. Just to turn to your Curriculum Vitae
14 for a second, please, Professor.

15 A. Sure.

16 MR. MORTON: Could she come back in
17 now if you're asking about his CV?

18 MR. STEIN: Yes.

19 MR. MORTON: Thank you.

20 MR. STEIN: Thank you. Sorry, I can't
21 keep track of that issue. I'm glad you are.

22

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1 A. Yes.

2 Q. And you understand him to take a
3 different view on whether a market exists or does
4 not exist; is that right?

5 A. Can you repeat the first part of that?

6 Q. You understand him to take a different
7 view than you do about the existence of a market
8 here?

9 A. Correct.

10 Q. Now, is this something about which
11 reasonable minds or reasonable economists can
12 disagree?

13 MR. MORTON: Object to form.

14 THE WITNESS: Is this something that
15 reasonable minds could disagree about?

16 BY MR. STEIN:

17 Q. Uh-huh.

18 A. I mean I've laid out my arguments for
19 why I have the opinion that I have.

20 Are you asking me to kind of
21 contrast with Professor Spulber? I don't
22 understand the question.

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1 STATE OF ILLINOIS)

2 COUNTY OF C O O K)

3 I, Donna M. Kazaitis, IL-CSR No. 084-003145,
4 do hereby certify:

5 That the foregoing deposition of MICHAEL
SINKINSON, PH.D., was taken before me at the time
6 and place therein set forth, at which time the
witness was put under oath by me;

7 That the testimony of the witness and all
objections made at the time of the examination
8 were recorded stenographically by me, were
thereafter transcribed under my direction and
9 supervision and that the foregoing is a true
10 record of same.

11 I further certify that I am neither counsel
12 for nor related to any party to said action, nor
13 in any way interested in the outcome thereof.

14 IN WITNESS WHEREOF, I have subscribed my name
15 this 6th day of March, 2025.

16

17

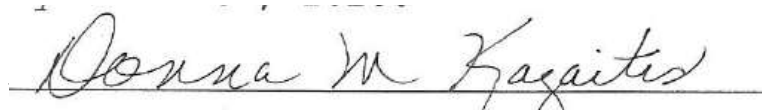
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A handwritten signature in cursive script, reading "Donna M. Kazaitis", is written over a horizontal line.

DONNA M. KAZAITIS, IL-CSR

IL-CSR License No. 084-003145